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VIA ECF

January 11, 2019

Hon. Katharine H. Parker, U.S.M.J
United States District Court – Southern District
500 Pearl Street
New York, NY 10007

RE: *De Los Santos v. Marte Construction Inc.et al.*, No. 18-10748 (PAE) (KHP)

Dear Judge Parker:

I represent plaintiffs in this action and write to request an adjournment of the initial conference scheduled for January 14, 2019 at 3:30pm, as well as to seek the Court's leave pursuant to Rule 15(2) to file an amended complaint. I am requesting the adjournment because the plaintiffs are in the process amending their complaint and serving the defendants.

The case was initiated with the filing of a complaint on November 16, 2018. That complaint included three plaintiffs and was against two defendants. On December 13, 2018, the three plaintiffs filed a consent order granting substitution of attorney. Docket No. 7. The Court has not endorsed the consent order as of the filing of this letter. The consent order seeks to substitute the undersigned in place of the attorney that filed the original complaint in this action.

On December 24, 2018 and again on December 28, 2018, I attempted to file an amended complaint but both times the electronic filing was rejected. The amended complaint was successfully e-filed on January 8, 2019. The amended complaint adds three plaintiffs and four defendants. In total, the amended complaint has six plaintiffs and six defendants. The Court should grant leave to amend the complaint in the circumstances. The Court should also adjourn the January 14, 2019 conference to a date that would allow plaintiff sufficient time to serve the amended complaint on all defendants (and defendants to retain counsel). Plaintiffs propose a date sometime after March 15, 2019.

Respectfully Submitted,

/s/ *Mohammed Gangat*
Mohammed Gangat